

## ROBERT A. VORT

Attorney at Law of New Jersey

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Hackensack, New Jersey 07601

Telephone: 201-342-9501

Facsimile: 201-342-9504

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September 1, 2015

Hon. Leda D. Wettre  
United States District Court  
Martin Luther King Jr. Federal Courthouse  
50 Walnut Street  
Newark, New Jersey 07102  
via PACER and by fax to 973-645-3535

Re: NVE Inc. v. Palmeroni  
Civil Action No. 06-5455

Dear Judge Wettre:

Defendant-counterclaimant Jesus J. Palmeroni served a request for production of documents on co-defendant Vincent Rosarbo by regular mail and by certified mail, return receipt requested. The request was mailed on February 13, 2015. The green card reflecting receipt of the envelope sent by certified mail was signed on February 20, 2015 by Vincent Rosarbo. The envelope sent by regular mail was not returned to this office.

Mr. Rosarbo has neither produced any of the documents requested. Neither has he objected to any request. I am serving him today with a notice for his deposition at my office on September 28, 2015. The notice directs him to appear at my office and to produce at that time the documents listed in the request for documents.

Hon. Leda D. Wettre

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September 1, 2015

I enclose a copy of the request for documents, of the letter of transmittal and of the green card indicating receipt.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be 'R. Vort', written over a faint rectangular stamp.

Robert A. Vort

RAV:bap

enclosures

cc: Aidan O'Connor, Esq.

Robert Basil, Esq.

Mr. Vincent Rosarbo - by regular mail and by  
certified mail, return receipt requested

Mr. Jesus J. Palmeroni

11-127

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**N.V.E., INC.** :  
Plaintiff, : Civil Action No. **06-5455**  
 : (Hon. Madeline Cox Arleo)  
-vs- :  
**JESUS J. PALMERONI** a/k/a Jo- : **REQUEST FOR PRODUCTION OF**  
seph Palmeroni, et al, : **DOCUMENTS PURSUANT TO FED.**  
 : **R.CIV.P. 34**  
Defendants. :

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**JESUS J. PALMERONI,** :  
Third Party Plaintiff, :  
-vs- :

**ROBERT OCCHIFINTO** and **WALTER** :  
**ORCUTT,** :  
Third Party Defendant. :


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TO: E. GREGORY CANNAROZZI, ESQ.  
470 Grant Avenue  
Oradell, New Jersey 07649

S I R:

Pursuant to Fed.R.Civ.P. 34(a)(1), defendants Jesus J. Palmeroni, Michelle Hooey, National Retail Consulting Group, Inc. and Global Marketing & Sales Group, LLC request that defendant Nicole DiLungo produce the documents within her possession, custody and control which are listed in the attached Schedule A at the office of Robert A. Vort, Suite 101, 2 University Plaza, Hackensack, New Jersey on March 9, 2015 at 10:15 a.m.

Dated: February 13, 2015

  
\_\_\_\_\_  
Robert A. Vort

**SCHEDULE A**

1. Any and all books, records, journals and financial statements of American Wholesale Distribution, Inc. from January 1, 2000 to date.

2. Any and all books, records, journals and financial statements of Smart World, Inc. from January 1, 2000 to date.

3. Any and all books, records, journals and financial statements of VAR Consulting, Inc. from January 1, 2000 to date.

4. Any and all federal income tax returns of American Wholesale Distributors for 2000 to date.

5. Any and all federal income tax returns of Smart World, Inc. for 2000 to date.

6. Any and all federal income tax returns of VAR Consulting, Inc. for 2000 to date.

7. Any and all federal income tax returns of Nicole DiLungo for 2000 to date.

8. Any and all written statements dated on or after May 1, 2006 given to plaintiff in this action or to its counsel.

9. Any and all correspondence, including e-mail, between you, on the one hand, and any other party to this action regarding the subject matter of this action since May 1, 2006.

10. Any and all correspondence, including e-mail, between you, on the one hand, and counsel for any other party to this action since May 1, 2006.

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February 13, 2015

Mrs. Angelina Rosarbo  
23 Thistle Meadow Lane  
Branford, Connecticut 06405

Re: NVE Inc. v. Palmeroni  
Civil Action No. 06-5455

Dear Mrs. Rosarbo:

I enclose a request for production of documents in your possession, custody or control.

Very truly yours,

Robert A. Vort

RAV:bap  
enclosures  
by regular mail and by certified mail,  
return receipt requested  
cc: Mr. Jesus J. Palmeroni  
11-127



**U.S. Postal Service™  
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Postage \$  
Certified Fee  
Return Receipt Fee  
(Endorsement Required)  
Restricted Delivery Fee  
(Endorsement Required)

Mrs. Angelina Rosarbo  
23 Thistle Meadow Lane  
Branford, CT 06405

Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mrs. Angelina Rosarbo  
23 Thistle Meadow Lane  
Branford, CT 06405

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Signature]*

Agent ☒ Address ☐

B. Received by (Printed Name)

*[Signature]*

C. Date of Delivery

*9/1/13*

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

2. Article Number

(Transfer from service label)

7013 2250 0001 2393 0796

PS Form 3811, July 2013

Domestic Return Receipt